

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 17-64 (DWF/KMM)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	<b>JOINT MOTION</b>
	)	<b>FOR CONTINUANCE AND</b>
v.	)	<b>REVISED SCHEDULING</b>
	)	<b>ORDER</b>
EDWARD S. ADAMS,	)	
	)	
Defendant.	)	

The parties in the above-captioned matter, through undersigned counsel, respectfully and jointly move for continuance of the motions hearing date and entry of a revised scheduling order.

Following the filing of the government's responsive memoranda this week in connection with Mr. Adams' motions, the parties conferred with respect to motions and evidentiary hearings. Based upon the filings and proceedings to date, and the intervening holiday next week, the parties jointly seek additional time to prepare for the hearings and to prepare and provide any required notices in advance. The parties also seek a consolidated motions and evidentiary hearing in the interests of efficiency for the Court and in consideration of travel by Mr. Adams' counsel.

The trial date in this matter is set for April 2018, and the parties do not request any adjustment to the trial date or deadlines related to it. The parties respectfully request that a consolidated motions and evidentiary hearing be held on December 8, 2017, if convenient for the Court. The parties propose that both parties be required to file a Notice of Intent to Call Witnesses one week before the new hearing date. Both parties would be required to file any responsive Notice of Intent to Call Witnesses within 48 hours after the initial notice is filed. All other deadlines contained in the Court's Scheduling Order dated May 18, 2017 (DCD 33) would remain the same.

### **CONCLUSION**

For the foregoing reasons, the parties respectfully request a continuance of the motions hearing date and a revised scheduling order that incorporates the dates requested above.

Dated: November 17, 2017

Respectfully Submitted,

s/ David M. Genrich  
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Acting United States Attorney

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